

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

Luis Enrique Juarez,	)	Judge Reed C. O'Connor
Plaintiff,	)	
v.	)	No. 4:22-cv-00169-O
	)	
H & K Steel Erectors Enterprises, LLC, H & K Steel	)	
Building, LLC, and Jason Soliz	)	
Defendants.	)	

**SUPPLEMENTAL PETITION FOR ATTORNEY'S FEES, TIME AND TASKS**

James M. Dore, having been first duly sworn on oath, states:

1. Plaintiff Luis Enrique Juarez retained me and my firm, to represent him in the above captioned lawsuit against the named Defendant(s). The above captioned lawsuit involves claims under the Fair Labor Standards Act to collect unpaid wages and overtime from Defendant(s), their former employer.
2. I am the primary attorney responsible for handling this matter. My Texas Bar number is 24128272. The administrative work on the file is performed by our employee, Derian Geovanni Palacios Morales, also referred to as "Gio" in our time keeping records. We do not bill any hourly time for work performed by Gio.
3. Our billable hourly rate is \$400.00 per hour for matters of this kind.
4. Our \$400.00 hourly rate is reasonable and comparable to rates charged by attorneys and staff of a comparative level, serving the same legal market.
5. The Court has previously granted Plaintiff's Petition for Attorney's Fees, but allowed leave to file a supplemental petition relating to the attorney time and costs incurred since the prior petition's filing. Dckt. 36.
6. The following list specifies an accurate statement of the subjects and the professional time spent since Plaintiff's prior petition for attorney's fees [Dckt. 31] and to be spent in the prosecution of the claim(s) of Plaintiff against the Defendants. The list represents the coincidental or reasonably current preparation of the subject matters and the time assigned as reflected in the records of the attorneys for Plaintiff:

<b>Date</b>	<b>Atty</b>	<b>Hours</b>	<b>Description of Activity</b>
9/6/2023	JMD	0.10	REVIEW ORDER SETTING SUPPLEMENTAL BRIEFING
9/13	JMD	1.25	DRAFT SUPPLEMENTAL BRIEF IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT
11/3	JMD	0.50	REVIEW REPORT AND RECOMMENDATIONS OF MAGISTRATE JUDGE
11/15	JMD	3.50	REVIEW CASE LAW CITED IN REPORT AND RECOMMENDATIONS; DRAFT OBJECTIONS TO THE SAME
3/23/23	JMD	0.25	REVIEW COURT ORDER RE: OBJECTIONS
3/31	JMD	0.50	DRAFT SUPPLEMENTAL PETITION FOR ATTORNEYS FEES
<b>Total Hours:</b> JMD 6.10 hrs X \$400.00 = \$2,440.00			

**Total Attorneys Fees = \$2,440.00**

6. These records identify the work that we did each day, the amount of time that we devoted to this matter on that day (including separate entries for each task), and a description of the work performed. The time entries on these invoices were entered by me personally, at or near the time of performing the work in the ordinary course of our daily practice. These billing records are kept in the ordinary course of our regularly conducted business activities. Some entries may have been redacted in part for the purpose of protecting attorney-client communications or work product privilege.

7. The tasks performed and the costs incurred were all reasonably and necessarily incurred in the case. The fees and costs incurred reflect tasks that were performed competently and efficiently.

8. Accordingly, the total amount of attorney's fees and costs being sought are **\$2,440.00**.

9. I have personal knowledge of the facts set forth in this Affidavit and can testify in accordance therewith.

### **Verification**

I declare under penalty of perjury that the foregoing is true and correct.

Executed: March 31, 2023

\_\_\_\_\_  
/s/ James M. Dore

**Justicia Laboral LLC**

**James M. Dore (Texas Bar No. 24128272)**

*Attorneys for Plaintiffs*

6232 N. Pulaski, Suite 300

Chicago, IL 60646

P: 773-415-4898

E: [jdore@justicialaboral.com](mailto:jdore@justicialaboral.com)

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Plaintiff,	)	
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	)	
H & K Steel Erectors Enterprises, LLC, H & K Steel	)	
Building, LLC, and Jason Soliz	)	
Defendants.	)	

**Notice of Filing**

TO: <b>H &amp; K Steel Building, LLC</b>	<b>H &amp; K Steel Erectors Enterprises, LLC</b>
<b>c/o Jason Soliz</b>	<b>c/o Jason Soliz</b>
Defendant	Defendant
6804 Eagle Heights Drive	6804 Eagle Heights Drive
Fort Worth, TX 76135	Fort Worth, TX 76135
 <b>Jason Soliz</b>	
Defendant	
6804 Eagle Heights Drive	
Fort Worth, TX 76135	

**PLEASE TAKE NOTICE** that on March 23, 2023, I caused to be filed the attached **Plaintiff's Supplemental Petition for Attorney's Fees**, copies of which are hereby served upon you.

\_\_\_\_\_  
/s/ James M. Dore

**Justicia Laboral LLC**  
James M. Dore (Texas Bar No. 24128272)  
*Attorneys for Plaintiffs*  
6232 N. Pulaski, Suite 300  
Chicago, IL 60646  
P: 773-415-4898  
E: jdore@justicialaboral.com

**Certificate of Service**

I, James M. Dore, an attorney, certify that I caused this **Notice and Plaintiff's Supplemental Petition for Attorney's Fees** to be filed with the Clerk of the Court on March 23, 2023 and I certify that I served this notice and documents by sending via regular mail to the attorneys/parties of record at their listed addresses below, and depositing the same in the U.S. Mail in Chicago on March 23, 2023, with proper postage prepaid:

**H & K Steel Building, LLC**  
**c/o Jason Soliz**  
Defendant  
6804 Eagle Heights Drive  
Fort Worth, TX 76135

**H & K Steel Erectors Enterprises, LLC**  
**c/o Jason Soliz**  
Defendant  
6804 Eagle Heights Drive  
Fort Worth, TX 76135

**Jason Soliz**  
Defendant  
6804 Eagle Heights Drive  
Fort Worth, TX 76135

\_\_\_\_\_  
/s/ James M. Dore

**Justicia Laboral LLC**  
James M. Dore (Texas Bar No. 24128272)  
*Attorneys for Plaintiffs*  
6232 N. Pulaski, Suite 300  
Chicago, IL 60646  
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